

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**JACQUE L. KNIGHT AND  
JOHN N. KNIGHT, Individually and  
as Parents and Natural Guardians  
of JOHN N. KNIGHT, II, a minor,**

**Plaintiffs,**

**v.**

**THE UNITED STATES,**

**Defendant.**

**: Civil No. 1:08-CV-1976**  
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**:**  
**: (Caputo, J.)**  
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**PLAINTIFFS' PRE-TRIAL DISCLOSURES**

Pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure, Plaintiffs, Jacque L. Knight and John N. Knight hereby provide their Pre-Trial Disclosures, in addition to the Expert Witness Disclosures previously submitted, as follows:

**Rule 26(a)(3)(A)**

Jacque L. Knight  
12 Field Circle  
Chambersburg, PA 17202  
(301) 991-9112

John N. Knight  
12 Field Circle  
Chambersburg, PA 17202  
(717) 404-6224

John N. Knight, II\*  
12 Field Circle  
Chambersburg, PA 17202

Stella Knight (grandmother)  
12 Field Circle  
Chambersburg, PA 17202  
(717) 404-6224

Thomas P. Orndorf, M.D.  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Katrina Haslett, M.D.\*  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Yvette M. Brown, M.D.\*  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Darlanna Besecker, R.N., CNM  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Sarah Widmann Myers, R.N., CNM  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Kim Amsley-Camp, R.N., CNM\*  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Maria Ankerbrand, LPN\*  
Lori Kraynek, LPN\*  
Laura Keller, RN\*  
Carol Rosenberry, RN\*  
Leandra Bowman, RN\*  
Keystone Women's Care  
755 Orland Avenue, Suite 101  
Chambersburg, PA 17201

Heather Fridinger, RN\*  
Courtney Rock, RN

Tracey Peterson, RN\*  
Jean Gaughan, RN\*  
Cynthia Montgomery, RN\*  
Chambersburg Hospital  
112 North Seventh Street  
Chambersburg, PA 17201  
(717) 267-3000

Dr. Wang- Anesthesiologist\*  
Chambersburg Hospital  
112 North Seventh Street  
Chambersburg, PA 17201  
(717) 267-3000

Ann Marie Tramontana, M.D.\*  
1130 Professional Ct.  
Hagerstown, MD 21740  
(301) 791-5555

Anthony Bruno, M.D.\*  
Chambersburg Hospital  
112 North Seventh Street  
Chambersburg, PA 17201  
(717) 267-3000

Matthew C. Kaufman, M.D.\*  
Helena P. Leite, M.D.\*  
Franklin County Pediatrics  
757 Orland Avenue, Suite 206  
Chambersburg, PA 17201  
(717) 263-0550

Harry P. Bramley, D.O.\*  
Ronald Williams, M.D.\*  
Sandeep K. Sandhu, M.D.\*  
Kelly L. Vanderhave, M.D.\*  
Milton S. Hershey Medical Center  
College of Medicine  
P.O. Box 850  
Hershey, PA 17033  
(717) 531-8521

Scott H. Kozin, M.D.  
Shriner's Hospital for Children  
3551 N. Broad St.

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Philadelphia, PA 19140  
(215) 430-4000

Begona Aristimuno, M.D.\*  
360 St. Charles Way  
York, PA 17402  
(717) 757-2020

Jill Cook  
Speech Therapist  
Franklin County Early Intervention  
218 N. 2<sup>nd</sup> Street  
Chambersburg, PA 17201  
(717) 263-1732

Tammy Steir, OTR/L  
Occupational Therapist  
6743 Fairway Drive East  
Fayetteville, PA 17222  
(717) 263-1732

Carolyn A. Coss, M.S., CCC  
Audiologist/Speech-Language Pathologist  
Easter Seals - Chambersburg Center  
55 Hamilton Road  
Chambersburg, PA 17201  
(717) 264-7578

Lynne Weinrich, Occupational Therapist  
Easter Seals Central Pennsylvania  
626 North Grant Street  
Waynesboro, PA 17268  
(717) 762-5315

Kathy Prieston, Speech Therapist  
Easter Seals Central Pennsylvania  
626 North Grant Street  
Waynesboro, PA 17268  
(717) 762-5315

Records Custodian\*  
Chambersburg Hospital  
112 North Seventh Street  
Chambersburg, PA 17201

Records Custodian\* of any of the above listed providers if the need arises

\* = if need arises

Any and all witnesses listed by the Defendant.

Plaintiffs reserve the right to amend this list

**Rule 26(a)(3)(B)**

Plaintiffs intend to call all of their witness live.

**Rule 26(a)(3)(C)**

Medical Records from the following providers:

- i. Chart of Anne Tramontana, MD
- ii. Chart of Keystone Women's Care
- iii. Chambersburg Hospital Records
- iv. Fetal Monitor Strips
- v. Newborn Records from Chambersburg Hospital
- vi. Hershey Medical Center Records for John N. Knight, II
- vii. Cumberland Valley Orthopedic Associates' Records
- viii. Franklin County Pediatrics Records
- ix. Shriner's Hospital for Children's Records

Deposition Transcripts of the following:


- i. Deposition of Dr. Orndorff with Exhibits
- ii. Deposition of Darlanna Besecker, CNM with Exhibits
- iii. Deposition of Sarah Myers, CNM with Exhibits
- iv. Deposition of Courtney Rock Greenberg, RN with Exhibits
- v. Deposition of Stella Knight
- vi. Deposition of John Knight
- vii. Deposition of Jacque Knight

Other Exhibits:

- i. Chambersburg Hospital Policies and Protocols
- ii. Photographs of John Knight, II
- iii. Videos of John Knight, II
- iv. Video of Shoulder Dystocia (exemplar)
- v. Anatomy of Shoulder Dystocia Diagram
- vi. Illustration of Shoulder Dystocia Injury
- vii. Anatomy of Brachial Plexus Diagram
- viii. Fundal Height Diagram

- ix. Pelvimetry Diagram
- x. Flow Chart Record of Delivery (handwritten)
- xi. Flow Chart Record of Delivery (typed)
- xii. Fetal Monitor Strips marked by Courtney Rock
- xiii. Friedman Curve Diagram
- xiv. Arrest of Labor Flow Chart Record
- xv. McRoberts Maneuver Diagram
- xvi. Woodscrew Maneuver Diagram
- xvii. Dr. Orndorff Labor and Delivery Note
- xviii. Nerve Tear Diagram
- xix. Forceps Exemplar
- xx. Vacuum Exemplar or Diagram
- xxi. Anatomical Model of Shoulder Dystocia
- xxii. Chronology/Timeline
- xxiii. Curriculum Vitae of Steven A. Klein, M.D.
- xxiv. Curriculum Vitae of S. Charles Bean, M.D.
- xxv. Curriculum Vitae of Cassandra Garcia, CNM
- xxvi. Curriculum Vitae of Donald Jennings, Ed.D.
- xxvii. Curriculum Vitae of Mona Yudkoff, RN
- xxviii. Curriculum Vitae of Andrew Verzilli, MBA
- xxix. Any and all exhibits listed in Plaintiffs' Expert witness disclosures
- xxx. Any and all exhibits listed by the Defendant

Plaintiffs reserve the right to amend this list.

  
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PA 34494  
BETH A. ADAMSKI, ESQUIRE  
PA 205971  
Attorneys for Plaintiffs  
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28th Floor  
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Dated: 2/15/10

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JACQUE L. KNIGHT AND JOHN N.	: CIVIL NO. 1:08-CV-1976
KNIGHT, Individually and as Parents and Natural	:
Guardians of JOHN N. KNIGHT, II, a minor	:
PLAINTIFFS	:
	:
v.	:
	:
KEYSTONE WOMEN'S CARE	: (Chief Judge Kane)
a/k/a KEYSTONE HEALTHCARE NETWORK,	:
THOMAS P. ORNDORF, M.D., YVETTE M.	:
BROWN, M.D., KATRINA N. HASLETT, M.D.,	:
DARLANNA Y. BESECKER, CNM,	:
SARAH WIDMANN MYERS, CNM, MS, AND	:
KIM AMSLEY-CAMP, CNM, MS	:
DEFENDANTS	: Filed Electronically

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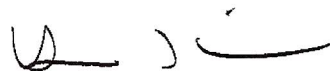
**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he is the attorney for plaintiffs and is a person of such age and discretion to be competent to serve papers.

That on February 15, 2010 he served a copy of the foregoing:

**Plaintiffs' Pre-Trial Disclosures Pursuant to Rule 26(a)(3)** by electronic means and by placing a copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Philadelphia, Pennsylvania to:

Michael J. Butler, Esquire  
Assistant United States Attorney  
Federal Building  
228 Walnut Street, Suite 220  
P.O. Box 11754  
Harrisburg, PA 17108



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HOWARD J. LEVIN, ESQUIRE  
Attorneys for Plaintiffs